

legal and equitable relief are sought pursuant to 42 U.S.C. §2000e-5(g) and (k), 42 U.S.C. §8-101, et seq.

3. injunctive and declaratory relief, damages, attorneys fees and other appropriate exercise of rights in violation of New York Executive Law, §290 et seq. and New York City Administrative Code, §8-101, et seq.

discrimination on the basis of race, age and in harassment and retaliation for the discrimination is based on 42 U.S.C. §2000e-5(f)(3), 28 U.S.C. §§1331 and 1343(3)(4).

2. Supplemental jurisdiction pursuant to 28 U.S.C. §1367 is sought to remedy §1985, and the First and Fourteenth Amendment to the United States Constitution.

Discrimination in Employment Act, 42 U.S.C. §2000 et seq., 42 U.S.C. §1981, 42 U.S.C. age in violation of Title VII of the 1964 Civil Rights Act, as amended, the Age

1. This action is brought to remedy discrimination on the basis of race, and

JURISDICTION AND VENUE
I

complaining of the defendant, alleges as follows, upon information and belief:

Plaintiff, AIDA BARBOSA, by her attorney Raymond Barbara, Esq.,
Defendants.
X
JACOB PERLOW HOSPICE CORPORATION
BETH ISRAEL MEDICAL CENTER, and
CONTINUUM HEALTH PARTNERS, INC.
PLAINTIFF DEMANDS A
TRIAL BY JURY
-against-
Plaintiff,
Plaintiff,
Defendants.
X
July 24, 2009

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
AIDA BARBOSA,
CIVIL ACTION NO.
X
6572

DOUGIE SCHENKELIN

6. Plaintiff was employed as a Billing Supervisor by the defendants CONTINUUM HEALTH PARTNERS, INC., BETH ISRAEL MEDICAL CENTER and the JACOB PERLOW HOSPICE CARE. CONTINUUM HEALTH PARTNERS, INC is located at 555 West 57th Street, 18th Floor, New York, NY 10019. BETH ISRAEL MEDICAL CENTER AND the JACOB PERLOW HOSPICE are located at located at First Avenue at 16th Street, County of New York, State of New York. Plaintiff had also worked for the defendants in various positions from 1990 to December 1, 2008 prior to her unlawful termination. In total, Plaintiff had worked for the

PARTIES

Opportunity Commission as Exhibit "A".

“The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.” Enclosed please find the determination of the United States Equal Employment

DETERMINATION BY THE U.S. EQUAL
EMPLOYMENT OPPORTUNITY COMMISSION

²⁹ U.S.C. §1391(b).

4. As many of the unlawful practices complained of herein occurred within the Southern District, venue is proper in this District pursuant to 42 U.S.C. §2000e-5(f)(3).

Constitution, New York State Executive Law, §297(9), and New York City

7. Plaintiff AIDA BARBOSA was and still is at all times hereinafter mentioned a defendant for approximately 18 years prior to her discharge, resident of the State of New York, County of New York.

8. At all times herein mentioned, Defendant CONTINUUM HEALTH PARTNERS, INC., was and still is a domestic corporation organized and existing under the laws of the State of New York.

9. At all times herein mentioned, Defendant CONTINUUM HEALTH PARTNERS, INC., was and still is a foreign corporation licensed to do business in the State of New York.

10. At all times herein mentioned, defendant CONTINUUM HEALTH PARTNERS, INC., was and still is a business partnership licensed to do business in the State of New York.

11. At all times hereinafter mentioned, defendant BETH ISRAEL MEDICAL PARTNERS, INC., was and still is a foreign corporation organized and existing under the laws of the State of New York.

12. At all times hereinafter mentioned, defendant BETH ISRAEL MEDICAL CENTER was and still is a domestic corporation organized and existing under the laws of the State of New York.

13. At all times hereinafter mentioned, defendant BETH ISRAEL MEDICAL CENTER was and still is a business partnership licensed to do business in the State of New York.

14. At all times hereinafter mentioned, defendant BETH ISRAEL MEDICAL CENTER was and still is a hospital located at First Avenue and 16th Street, County of New York.

County of New York, State of New York that is the subject of this lawsuit.

CORPORATION was and still is a hospice care located at First Avenue and 16th Street, County of New York, State of New York.

21. At all times hereinafter mentioned, defendant JACOB PERLOW HOSPICE State of New York.

CORPORATION was and still is a business partnership licensed to do business in the State of New York.

20. At all times hereinafter mentioned, defendant JACOB PERLOW HOSPICE State of New York.

CORPORATION was and still is a foreign corporation licensed to do business in the State of New York.

19. At all times hereinafter mentioned, defendant JACOB PERLOW HOSPICE Laws of the State of New York.

CORPORATION was and still is a domestic corporation organized and existing under the Laws of the State of New York.

18. At all times hereinafter mentioned, defendant JACOB PERLOW HOSPICE termination.

HEALTH PARTNERS, INC. since November 25, 1996 prior to her wrongful MEDICAL CENTER at all times and an employee of defendant CONTINUUM

17. At all relevant times, plaintiff had been an employee of defendant BETH ISRAEL defendant BETH ISRAEL MEDICAL CENTER.

PARTNERS, INC. since November 25, 1996, became the parent company of CONTINUUM HEALTH

16. At all times hereinafter mentioned, defendant CONTINUUM HEALTH York, State of New York.

CENTER had a principal place of business at First Avenue at 16th Street, County of New York, State of New York that is the subject of this lawsuit.

15. At all times hereinafter mentioned, defendant BETH ISRAEL MEDICAL

(Hospice Division) owned, operated, managed, maintained, and controlled by the Hospice Corporation d/b/a Continuum Hospice Care and Beth Israel Medical Center. 27. Plaintiff, who is a fifty-six year old Hispanic woman, had worked at Jacob Perlow

ALL CAUSES OF ACTION:
FACTUAL ALLEGATIONS COMMON TO
IV

Hispanic.

relevant times acted vicariously on behalf of the employer. None of these supervisors are relevant times acted vicariously on behalf of the employer. None of these supervisors are CENTRE hereinafter referred to in this complaint were supervisors of Plaintiff and at all

JACOB PERLOW HOSPICE CORPORATION and BETH ISRAEL MEDICAL
26. The employees of Defendants CONTINUUM HEALTH PARTNERS, INC., and the Administrative Code §8-102(5).

within the meaning of Title VII, 42 U.S.C. §2000(e)(b), the Human Rights Law §292(5) HOSPICE CORPORATION and BETH ISRAEL MEDICAL CENTER are employees

25. Defendants CONTINUUM HEALTH PARTNERS, INC, JACOB PERLOW November 25, 1996 prior to her wrongful termination.

times and an employee of defendant CONTINUUM HEALTH PARTNERS, INC. since PERLOW HOSPICE CORPORATION and BETH ISRAEL MEDICAL CENTER at all

24. At all relevant times, Plaintiff had been an employee of defendant JACOB CORPORATION was established by BETH ISRAEL MEDICAL in 1988.

23. At all times hereinafter mentioned, defendant JACOB PERLOW HOSPICE County of New York, State of New York.

CARE CORPORATION had a principal place of business at First Avenue at 16th Street,

29. At all times hereinafter mentioned, defendant JACOB PERLOW HOSPICE

defendants CONTINUUM HEALTH PARTNERS, INC. for approximately eighteen years. Her last position was Billing Supervisor to which she was promoted July 1, 2007. Prior to Plaintiff's wrongful termination, she had performed her work duties admirably. Carolyn Cassin, the former President and CEO of Continuum Hospice Care in January 2008 affidavit stated that the Plaintiff had a stellar record during her tenure and as a result was promoted.

29. On or about June 25, 2007, Plaintiff was informed by Ms. Allison Maughan, Vice President Finance, that Plaintiff was being promoted to Billing Supervisor. Ms. Maughan informed Plaintiff that she would be given a raise of \$3,000 to take on this responsibility. Plaintiff indicated to Ms. Maughan that she was also to get a 3% cost of living adjustment on July 1, 2007. Ms. Maughan assured Plaintiff that this would also be given this adjustment.

30. On or about July 31, 2007, Plaintiff spoke to Ms. Maughan about the cost of living adjustment. Ms. Maughan indicated that Ms. Carol Lowe, Vice President Human Resources - Hospice, was working on it.

31. On or about August 6, 2007, Plaintiff spoke to Ms. Lowe about the cost of living adjustment. Ms. Lowe indicated that she did not know anything about the cost of living adjustment. Ms. Lowe indicated that she did not know anything about the cost of living adjustment but would check with Ms. Maughan.

32. On or about August 4, 2008, Plaintiff met with Ana Morelli, and Charlotte Smith, Finance Director. Plaintiff was informed that there was incentive being given by Beth Israel Medical Center. That Plaintiff's evaluation was done and given to BIMC in June 2008. Based on the evaluation Plaintiff would be given a raise. Charlotte Smith had written up the evaluation since Ana was new and was not aware of Plaintiff's

intermittence leave of absence this way nothing could happen to Plaintiff. Charlotte picking in regularly. Corporate Labor and Relations informed Plaintiff to do an was evaluated incorrectly and she was suffering stress and because of that her asthma was a call from Corporate Labor and Relations and Plaintiff explained her situation that she message for the EEO Officer to call Plaintiff back regarding her issue. Plaintiff received provide it by Ms. Lowe. Plaintiff then called Labor and Relations at Corporate and left a office. Plaintiff requested again the name of the Corporate EEO Officer but was never and number of the Corporate EEO Officer. Ms. Lowe indicated that she was the EEO 35. On or about August 14, 2008, Plaintiff spoke to Carol Lowe and asked the name not to do anything because Plaintiff was upset.

she had her resignation on her desk. Ms. Lowe told Plaintiff to sit down and relax and not happy with evaluation; that it was contradictory. Plaintiff indicated to Ms. Lowe that 34. On or about August 13, 2008, spoke to Carol Lowe and Plaintiff told her she was state that employee has right not to sign evaluation.

that she refused to sign evaluation even though Corporate Human Resource guidelines yelled at Plaintiff and stated that she would put a comment in Plaintiff's file indicating Ms. Smith angrily indicated to Plaintiff that she was not going to change anything in the evaluation. Plaintiff then indicated that she would not sign the evaluation. Ms. Smith regarding Plaintiff's evaluation. Ms. Smith read the comments provided by Plaintiff and 33. On or about August 13, 2008, Plaintiff met with Anna Morelli and Charlotte Smith department June 30, 2008.

to raise was planned since it had already been given to defendant's Human Resource responsibilities. Evaluation was to be reviewed by Plaintiff for comments but no change

36. Plaintiff claims that she was subjected to a hostile work environment and discriminated due to her race and age. On or about August 2008, Plaintiff was harassed and threatened by Ms. Charlotte Smith, Finance Manager, during a meeting by Plaintiff involving clients and also wanted Plaintiff to train non-Continuum employees. Plaintiff wanted Plaintiff not to follow CMS and National Government Service regulations in to update Ms. Smith on billing collections efforts. Ms. Smith told Plaintiff that she refused to break the guidelines. Ms. Smith became irritated and told Plaintiff that "she was the boss and whatever she said was going to be done." Plaintiff was then told by Ms. Smith that "She would do anything for Alison Maughan to get the promotion she deserved."

37. On about August 2008, Plaintiff was threatened by Ms. Alison Maughan. Plaintiff had a meeting with Charlotte Smith and Alison Maughan and Plaintiff was threatened by Ms. Smith. Ms. Smith indicated to Plaintiff that she could fire Plaintiff for her actions against Ms. Smith. Plaintiff indicated to Ms. Maughan that she felt she was being threatened by Ms. Smith because Plaintiff had inquired about her cost of living adjustment. Ms. Maughan indicated to Ms. Smith that she had no right to talk to Plaintiff in a threatening manner.

38. On or about April 29, 2008, received resignation letter from Gloria Fernandes, medicare biller effective May 31, 2008. Informed Charlotte Smith that Gloria had resigned.

39. On or about April 30, 2008, Plaintiff spoke to Ms. Charlotte Smith and was informed by Ms. Smith that she had called Clarisse Cassenetta to come back to work to reschedule.

become the Medicare biller. Ms. Smith also indicated that Ms. Cassanetta wanted to come back but only as the lead biller. Charlotte Smith also indicated that she had informed Ms. Cassanetta that Plaintiff was going back to school to get her master's degree and Plaintiff would be leaving in a year and half and that she could have the job at that time. Ms. Cassanetta refused. Ms. Cassanetta, was under the age of 40 years and was of Filipino descent. Ms. Cassanetta had been trained by Plaintiff while previously employed by defendants.

40. On November 19, 2008, Anna Morelli informed Plaintiff that Charlotte Smith informed her that Plaintiff did not have to attend a training class.

41. On November 20, 2008, Plaintiff was visited by Anna Morelli in Carole Lowe. Anna Morelli stated she had to talk to Plaintiff. Ms. Morelli stated to Plaintiff that she knew Plaintiff was going to go on vacation on Friday, November 21, 2008. Ms. Morelli told Plaintiff that she was not to come back after her vacation. That she was being terminated effective December 1, 2008. Plaintiff was given a letter by Carol Lowe and asked to clean her desk. Plaintiff was then escorted off the premises.

42. On about December 1, 2008, defendants hired Clarissa Cassanetta to replace Plaintiff. Plaintiff filed a Charge of Discrimination with the EEOC on or about November 28, 2008, filed a Charge of Discrimination with the EEOC

43. As a result of this discharge, Plaintiff lost all her employee benefits, sick time, health benefits, pension, vacation time, seniority, and promotion opportunity.

44. As a result of this discharge, Plaintiff also has not received any money from her pension.

(Exhibit B).

45. Defendants CONTINUUM HEALTH PARTNERS, INC., JACOB PERLOW
HOSPICE CORPORATION and BETH ISRAEL MEDICAL CENTER was deliberately
indifferent to Plaintiff's complaints of harassment. Defendant's continued acquiescence,
retaliation, action or inaction amounted to a policy or custom of toleration of race and age
discrimination and retaliation.

46. Defendants CONTINUUM HEALTH PARTNERS, INC., JACOB PERLOW
HOSPICE CORPORATION and BETH ISRAEL MEDICAL CENTER has failed to
effectively train its employees about preventing harassment and race and age
discrimination or about investigating or disciplining harassing harassment and race and age

47. Defendants CONTINUUM HEALTH PARTNERS, INC., JACOB PERLOW
HOSPICE CORPORATION and BETH ISRAEL MEDICAL CENTER's custom or
policy of refusing to effectively investigate complaints of harassment and race and age
discrimination.

48. Defendants CONTINUUM HEALTH PARTNERS, INC., JACOB PERLOW
discrimination or to discipline offenders guilty of harassment and race and age
discrimination amounted to deliberate indifference on the part of the defendant.

49. Defendants CONTINUUM HEALTH PARTNERS, INC., JACOB PERLOW
HOSPICE CORPORATION and BETH ISRAEL MEDICAL CENTER's retaliation of
plaintiff is based on race and age and a hostility to equal treatment of female Hispanic
employees of advanced age.

49. Defendants CONTINUUM HEALTH PARTNERS, INC., JACOB PERLOW
HOSPICE CORPORATION and BETH ISRAEL MEDICAL CENTER's failure to
effectively investigate and remedy harassment and race and age discrimination is based
on race and age discrimination and causes a chilling of elderly Hispanic employees'

other female Hispanic employees of advanced age, free of imminence on the basis race and age. Defendants has a duty to provide and ensure a workplace for Plaintiff and right to oppose and complain of discrimination against herself on the basis of her to be free of discrimination on the basis of her race and age in the workplace and her of her race and age, of her rights, privileges and immunities, particularly of her right intentionally, willfully, and without justification, acted to deprive Plaintiff, on the ground of the Civil Rights Act and the Age Discrimination in Employment Act. Defendants discrimination against her on the basis of her race and age, in violation of Title VII Plaintiff on the basis of her race and age and in retaliation for her opposition to 51. In wrongfully terminating Plaintiff, defendants have discriminated against on race and age.

FIRST CAUSE OF ACTION
V

which has subjected Plaintiff to an abusive or hostile discriminatory environment based CENTER's pattern or practice of harassment and race and age discrimination to exist INC, JACOB PERLOW HOSPICE CORPORATION and BETTY ISRAEL MEDICAL 50. Based on the foregoing, the defendants CONTINUUM HEALTH PARTNERS, protected rights.

Constitution in violation of the First and Fourteenth Amendments of the United States

basis of her race and age in retaliation asserting rights protected by the U.S.

55. Defendants have discriminated against plaintiff by terminating plaintiff on the

it more fully set forth herein.

numbered "1" through "53" of the complaint with the same force and effect as

54. Plaintiff repeats and re alleges each and every allegation contained in paragraphs

SECOND CAUSE OF ACTION
VI

grants relief.

55. Plaintiff as a result of defendant's discriminatory practices unless and until this Court

benefits, tension, vacation time, and seniority, psychological trauma, mental anguish and

of promotion opportunity, loss of pay raises, loss of employee benefits, sick time, health

53. Plaintiff has and will continue to suffer irreparable injury, loss of income, loss

these acts, omissions and misconduct.

52. The defendants, despite knowledge and adequate opportunity to learn of the

retaliation for exercising protected rights.

American employees of advanced age from a hostile or abusive work environment and

the rules, regulations and laws necessary to protect her and other female Hispanic-

of race and age, intimidation, discriminatory stimuli and retaliation, and to enforce

Executive Law, §290, et seq. and New York City Administrative Code, §§8-101 et seq. Plaintiff in the workplace on the basis of her race and age in violation of New York 59. In wrongfully terminating Plaintiff, defendants have discriminated against fully set forth herein.

numbered "1" through "57" of the complaint with the same force and effect as if more 58. Plaintiff repeats and re alle ges each and every allegation contained in paragraphs

THIRD CAUSE OF ACTION VII

grants relief.

hummilation as a result of defendants' discriminatory practices unless and until this Court 57. Plaintiff has and will continue to suffer irreparable injury, loss of income, loss of benefits, pension, vacation time, and seniority, psychological trauma, mental anguish and promotion opportunity, loss of pay raises, loss of employee benefits, sick time, health and in violation of 42 U.S.C. §1981 and 42 U.S.C. §1985.

and in violation of 42 U.S.C. §1981 and 42 U.S.C. §1985.

Fourteenth Amendment, and her right to free speech provided by the First Amendment, including but not limited to her rights to equal protection of laws provided by the 56. Defendants, by their conduct herein alleged, intentionally, willfully and without privilegees and immuniti es secured by the Constitution and the laws of the United States, justificati on, deprived Plaintiff on grounds of her race and age, of her rights,

Constitution, 42 U.S.C. §1981, and 42 U.S.C. §1985.

grants relief.

humiliation as a result of defendants' discriminatory practices unless and until this Court promotion opportunity, loss of pay raises, psychological trauma, mental anguish and 62. Plaintiff has and will continue to suffer irreparable injury, loss of income, loss of these acts, omissions and misconduct.

misconduct of the agents, supervisors and employees, adopted, approved and ratified 61. The defendants, despite knowledge and adequate opportunity to learn of the abusive work environment and retaliation for exercising protected rights.

other female Hispanic employees of advanced age from a racially hostile or retaliation, and to enforce the rules, regulations and laws necessary to protect her and employees of advanced age free of innuendo, intimidation, discriminatory animus and a duty to provide and ensure a workplace for Plaintiff and other female Hispanic discrimination against herself, based on her race and age. Defendants have oppose and complain of harassment on the basis of her race and age, and age, and discrimination in the workplace based on her race and age, and her right to immunities, particularly of her right to be free of harassment based on her race and to deprive her, on the grounds of her race and age, her rights, privileges and based on her race and age, and intentionally, willfully and without justification, acted age and in retaliation for her opposition and complaint of discrimination directed at her 60. Defendants have discriminated against Plaintiff on the basis of her race and

WHEREFORE, plaintiff respectfully requests that this Court enter a judgment:

(a) declaring that the acts and practices complained of herein are in violation of Title VII,
the Age Discrimination in Employment Act, the First and Fourteenth Amendments, 42 U.S.C.
§1981, 42 U.S.C. § 1985, New York Executive Law and New York City
U.S.C. §1981 and 42 U.S.C. § 1985, New York Executive Law and New York City
§1981 and 42 U.S.C. §1985, New York Executive Law and New York City
Discrimination in Employment Act, the First and Fourteenth Amendments, 42 U.S.C.
(b) enjoining and permanently restraining these violations of Title VII, the Age
Administrative Code;

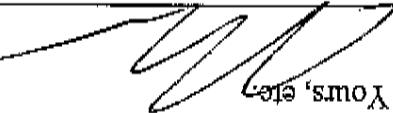
(c) directing defendants to take such affirmative action as is necessary to ensure that the
effects of these unlawful practices are eliminated and to not continue to affect plaintiff's
(d) awarding plaintiff the costs of this action together with reasonable attorney's fees, as
provided by Title VII and 42 U.S.C. §1988;

(e) directing defendants to pay plaintiff compensatory damages and damages for lost
income, lost promotional opportunities, loss of pay raises, loss of employee benefits, sick
time, health benefits, pension, vacation time, and seniority, psychological trauma, mental
anguish and humiliation in the First Cause of Action;

(f) directing defendants to pay plaintiff compensatory damages and damages for lost
income, lost promotional opportunities, loss of pay raises, loss of employee benefits, sick
time, health benefits, pension, vacation time, and seniority, psychological trauma, mental
time, health benefits, pension, vacation time, and seniority, psychological trauma, mental
anguish and humiliation in the First Cause of Action;

PRAVYER FOR RELIEF

100 West Monroe Street
Chicago, Illinois 60603
(312) 223-9885
AIDA BARBOSA
Attorney for Plaintiff
Raymond Barbosa (RB 6801)


Yours, etc.

July 20, 2009
Dated: Chicago, Illinois

Plaintiff demands a trial by jury in this action.

Pursuant to 42 U.S.C. §1981A and Rule 38(b) of the Federal Rules of Civil Procedure,

DEMAND FOR A TRIAL BY JURY

as this Court deems necessary and proper.

(h) directing defendant to pay punitive damages and granting such other and further relief

mental anguish and humiliation in the Third Cause of Action;

sick time, health benefits, pension, vacation time and seniority, psychological trauma,

income, lost promotional opportunities, loss of pay raises, loss of employee benefits,

(g) directing defendant to pay plaintiff compensatory damages and damages for lost

anguish and humiliation in the Second Cause of Action;

DISMISSAL AND NOTICE OF RIGHTS

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

To: Aida Barboza
2065 1st Avenue
New York, NY 10029
John F. Kennedy Fed Bldg
Government Ctr, Room 475
Boston, MA 02203

EEOC Charge No. 520-2008-00973
On behalf of *person(s)* - *aggravated who/so detailed* is
COMPLAINT (29 CFR 1601.7(a))

EEOC Form 101 (Rev. 6-2000)

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:
(617) 565-3192
The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

The EEOC is closing its file on this charge
because the Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the statutes, as detailed above, are violated. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

The EEOC has adopted the finding of the state or local fair employment practices agency that investigated this charge.

Other (briefly state)

(See the additional information attached to this form.)

NOTICE OF SUIT RIGHTS.

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged Payments. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

Title VII, the Americans With Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice, or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Evidence(s)

cc:

CONTINUUM HEALTH PARTNERS
Attn: Mary Higeman, Esq.
335 West 57th Street
100 West Monroe Street, Suite 711
Raymond Barboza, Esq.
Raymond Barboza, Esq.
Area Office Director
Ridder L. Sanders,
Ridder L. Sanders,
(Date mailed)

APP 8 1 2009

Raymond Barboza
Chairman of the Commission

WAGE OF DISCRIMINATION